

May 4, 2006

PUBLIC DOCUMENT

BY HAND DELIVERY

Mr. David Spooner
Assistant Secretary for Import Administration
U.S. Department of Commerce
Central Records Unit, Room 1870
Pennsylvania Avenue and 14th Street, NW
Washington, DC 20230

Re: Rebuttal Comments Regarding “Antidumping Proceedings: Calculation of the Weighted Average Dumping Margin During an Antidumping Duty Investigation”

Dear Mr. Spooner:

On behalf of the Coalition for Fair Lumber Imports (the “Coalition”), we hereby submit the following rebuttal comments in response to the Department’s March 6, 2006 notice concerning the calculation of the weighted average dumping margin in an antidumping duty investigation.¹

In comments filed April 5, 2006, the Coalition endorsed the comments filed on that date by the Committee to Support U.S. Trade Laws (“CSUSTL”).² The Coalition further submitted

¹ See Antidumping Proceedings: Calculation of the Weighted Average Dumping Margin During an Antidumping Duty Investigation, 71 Fed. Reg. 11,189 (Mar. 6, 2006). The Department extended the deadline for the submission of rebuttal comments to May 4, 2006. Id. 79 Fed. Reg. 23,898 (Apr. 25, 2006) (Extension of Rebuttal Comment Period).

² Letter from Dewey Ballantine LLP to the U.S. Department of Commerce at 2 (Apr. 5, 2006) (“Dumping Calculation Comments”).

that, should the Department abandon its use of average-to-average comparisons in calculating the weighted-average dumping margin in an antidumping investigation, (1) under no circumstances should the Department abandon its established practice of excluding offsets for non-dumped comparisons, and (2) the most appropriate methodology to be applied in future antidumping investigations is the Department's transaction-to-transaction methodology, in conjunction with the aforementioned exclusion of offsets for non-dumped comparisons.³

The Coalition concurs with and joins in the rebuttal comments filed today by CSUSTL.⁴

Please contact the undersigned if you have any questions regarding these comments.⁵

Respectfully submitted,

Bradford L. Ward
Rory F. Quirk
Gregory I. Hume, Economist
Richard C. Lutz, International Trade Analyst

DEWEY BALLANTINE LLP

Counsel to the Coalition for Fair Lumber Imports

³ Id. at 2-3, 6.

⁴ Letter from the Committee to Support U.S. Trade Laws to the U.S. Department of Commerce (May 4, 2006).

⁵ A CD-Rom containing this submission in electronic form accompanies the required paper copies, in accordance with the Department's instruction.